



F I S H E R | T A U B E N F E L D L L P

225 Broadway, Suite 1700  
New York, New York 10007  
Main 212.571.0700  
Fax 212.505.2001  
www.fishertaubenfeld.com

Writer's direct dial: (212) 384-0258  
Writer's email: michael@fishertaubenfeld.com

**VIA ECF**

The Honorable Katharine H. Parker, U.S.M.J.  
U.S. District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007

**APPLICATION GRANTED**

Katharine H. Parker  
**Hon. Katharine H. Parker, U.S.M.J.**

4/30/2025

Re: Rene v. 31 East 21 Express Inc. et al.  
Case No.: 21-cv-7435 (JGK) (KHP)

Dear Judge Parker:

We represent Plaintiff in this action. We write to respectfully request a single business day extension of Plaintiff's deadline to file his evidence and memorandum of law in support of his motion for a default judgment from April 25, 2025 to April 28, 2025, and a corresponding extension of Defendants' response deadline from May 9, 2025 to May 12, 2025. We request this brief extension because although the motion papers is ready to be filed, we will be unable to serve all 8 Defendants before the Jewish Sabbath in an hour. We therefore respectfully request this brief extension to file and serve the motion papers.

Thank you for your consideration of the above.

Respectfully Submitted,

-----/s/-  
Michael Taubenfeld